

### **REMARKS**

Claims 1 – 5 and 7 – 16 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejection(s) in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1 – 5, 7 and 8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Melchione et al. (U.S. 5,966,695) in view of Burdick (U.S. 5,625,816) for the reasons set forth in the Official Action mailed September 29, 2005. Applicants submit that this rejection is inappropriate for the reasons set forth in their response to the September 29, 2005 Official Action filed December 22, 2005 and as further discussed herein.

Claims 1 and 7 are the independent claims. Amended claim 1 is directed to a computer-implemented method for providing congruent marketing data to a plurality of venue specific clients. It requires, *inter alia*, compiling marketing data from a plurality of disparate data sources into a centralized database and "creating a venue specific database for each venue specific client as a subset of data contained within the centralized database wherein the venue specific database is in a format specific to the venue specific client." The Examiner discounted applicants' arguments that neither Melchione et al. nor Burdick et al. disclose or suggest creating a venue specific database as a subset of data contained within the centralized database wherein the venue specific database is in a format specific to the venue as follows:

[T]he Examiner respectfully disagrees with applicants' arguments because Melchione et al. does disclose the concept of a central database for receiving information from different sources, and Burdick et al. discloses the concept of a localized database having a subset of the data within the localized database.

However, the Examiner ignores a key part of applicants' argument that the venue specific database as claimed in claim 1 must be in a format that is specific to the venue (now venue specific client) and neither reference discloses or suggests creating a venue specific database in a format that is specific to the venue. The Examiner acknowledged in the September 29, 2005 Official Action that Melchione et al. does not

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disclose creating a venue specific database. And simply because Burdick et al. discloses that a subset of a database table may be provided to a number of remote database servers does not disclose that this subset of the database table must be in a format that is specific to a venue (or venue specific client). Burdick et al. is simply silent on the format of this subset of the database table.

Further, amended claim 1 now requires a plurality of venue specific clients and creating a venue specific database for each venue specific client. It also requires that the venue specific database for each venue specific client be in a format specific to the venue specific client. Applicants submit that neither Melchione et al. or Burdick et al. disclose creating a venue specific database for each of a plurality of venue specific clients where the venue specific database for each of the venue specific clients is in a format specific to that venue specific client. Again, Melchione et al. does not disclose creating a venue specific database and Burdick et al. is silent on the format of the subset of the database table.

For these reasons, applicants submit that amended claim 1 is allowable over Melchione et al. in view of Burdick et al.

New claim 9, which depends from amended claim 1, requires "determining the subset of data contained within the centralized database required for the venue specific database for each venue specific client and extracting each determined subset of data from the centralized database to create each venue specific database." Melchione et al. does not disclose creating a venue specific database and Burdick et al. at best discloses that a subset of a database table can be replicated from a local database server to any number of remote database servers. But Burdick is silent on how this subset of the database table is determined. Applicants submit that Burdick thus fails to disclose determining the subset of data contained within the centralized database required for the venue specific client, as required by new claim 9. Applicants further submit that Burdick fails to disclose extracting each determined subset of data from the centralized database to create each venue specific database. Applicants submit that new claim 9 is thus allowable over Melchione et al. in view of Burdick et al.

New claim 12, which depends from new claim 9, requires that the determined subsets of data for the venue specific databases for at least two of the client specific

venues are different. Again, Melchione et al does not disclose creating a venue specific database. Burdick et al. is silent on how the subset of the database table is determined and also does not address that determined subsets of data for the venue specific databases for at least two of the client specific venues are different. Burdick implies, if not expresses, the opposite – that the same subset of the database table is replicated over remote database servers. As stated in Burdick et al.: “The entire contents of a database table or a subset of that table may be replicated from a local database server (e.g., 105) to any number of remote database servers.” [Burdick et al., col. 10, lines 61 – 63] Applicants submit that this statement implies, if not expresses, that it is the same subset of the database table that is replicated to the remote database servers. Applicants submit that new claim 12 is thus allowable over Melchione et al. in view of Burdick et al.

New claim 13, which depends from amended claim 1, requires creating each venue specific database each time marketing data is added to the centralized database. Again, Melchione et al. does not disclose creating a venue specific database. And Burdick et al. at best discloses creating a subset of a database table. Burdick et al. does not disclose when the subset of the database table is created and certainly does not disclose creating it each time data is added to a centralized database. Applicants submit that new claim 13 is thus allowable over Melchione et al. in view of Burdick et al.

New claim 14, which depends from amended claim 1, requires determining how frequently data from each of the disparate data sources is to be compiled into the centralized database and compiling data from each of the disparate data sources into the centralized database based on those determinations. Applicants submit that neither Melchione et al. or Burdick et al. disclose determining how frequently data from each of disparate data sources is to be compiled into the centralized database and then compiling the data from each of these disparate data sources into the centralized database based on those determinations. Melchione et al. relies on internal and external feeds. [Melchione et al, Abstract lines 3 – 5; col. 6, lines 51 – 58] Thus, Melchione et al does not disclose determining how frequently data from each of disparate data sources is to be compiled into the centralized database and then compiling the data from each of the disparate data sources into the centralized

database based on those determinations. In Burdick et al. raw data pertaining to semiconductor fabrication is generated, reformatted into DIS data, and loaded into a database server to produce a database. [Burdick et al., col. 5, lines 36 – 39] Thus, Burdick et al. also does not disclose determining how frequently data from each of disparate data sources is to be compiled into the centralized database and then compiling the data from each of the disparate data sources into the centralized database based on those determinations. Applicants submit that new claim 14 is thus allowable over Melchione et al. in view of Burdick et al.

Claim 7 requires, *inter alia*, an extract module for extracting a subset of marketing data from a centralized marketing database wherein the extract module extracts marketing data specific to the requirements of a particular client of the data, and a venue specific database comprising the subset of marketing data. The Examiner discounted applicants' arguments made in their response to the prior Official Action that neither Melchione et al. nor Burdick et al. disclosed or suggested such an extract module by taking the position that Melchione et al. discloses software for extracting a subset of marketing data. But this ignores that part of this limitation of Claim 7 that requires that the extracted marketing data be specific to the requirements of a particular client of the data. And applicants submit that the disclosure in Melchione et al. that queries can be run to extract data from Melchione et al. database fails to disclose that the extracted data must be specific to the requirements of a particular client of the data. Applicants submit that claim 7 is thus allowable over Melchione et al. in view of Burdick et al.

New claim 15, which depends from claim 7, requires a plurality of clients of the data with each of the clients having different requirements for the data. It further requires that the extract module extracts a subset of the marketing data from the centralized marketing database based on the requirements for each client to create a venue specific database for each client where each venue specific database has a different subset of the marketing data. For reasons similar to those discussed with respect to new claims 9 and 12, applicants submit that new claim 15 is allowable over Melchione et al. in view of Burdick et al.

New claim 16, which depends from claim 7, requires that the compilation module determinates how frequently to compile data from each of the plurality of data sources into the centralized marketing database and compiles the data from each of the plurality of data sources into the centralized marketing database based upon those determinations. For reasons similar to those discussed with respect to new claim 14, applicants submit that new claim 16 is allowable over Melchione et al. in view of Burdick et al.

Claims 2 – 5 and 9 – 14 depend directly or indirectly from amended independent claim 1, and are also allowable for at least this reason. Claims 8, 15 and 16 depend from independent claim 7, and are also allowable for at least this reason.

#### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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